



4. Not a single document was produced, nor was a single commitment to produce any document(s) provided.

5. Defendants' general objections and their rote, boilerplate objections are improper.

6. As demonstrated in SNMP Research's Memorandum filed in support of this Motion, Defendants even concede that they have refused to provide any "meaningful, substantive" (Defendants' own words) responses to Plaintiff's Document Requests.

7. Furthermore, while Defendants agreed to meet and confer with Plaintiff over the deficiencies in Defendants' responses to the Second RFPs, they have refused to meet and confer in good faith, insisting that SNMP Research enumerate in writing its basis for contending each of the multitude of general and boilerplate objections Defendants have interposed is not applicable, and then admitting that regardless of what SNMP Research does, Defendants intend to stand on all of their stated objections until this Court has ruled on Defendants' Motion to Stay Discovery.

8. Defendants' conduct reveals that they have no intention of properly responding to discovery so long as the Motion to Stay Discovery is pending. Defendants' Responses do not meet the spirit or the requirements of discovery provided by Rules 26, 34, and 37 of the Federal Rules of Civil Procedure and applicable case law.

9. Defendants' conduct flouts their obligations under the Federal Rules of Civil Procedure.

10. Plaintiffs are prejudiced in the prosecution of their claims by Defendants' conduct and refusals.

11. In support of this Motion, SNMP Research submits the accompanying Memorandum of Law and Declaration of John L. Wood.

WHEREFORE, for the reasons set forth above, and as are set forth in Plaintiff's Memorandum of Law in support of its Motion to Compel Responses to Plaintiff's Second Set of Requests for

Production of Documents, and upon the grounds as shall be raised at oral argument of this Motion (if any), Plaintiff asks this Court to enter an order compelling Defendants Brocade and Broadcom to respond to each of Plaintiff's Document Requests without further delay and hold that all of Defendants' respective objections to Plaintiff's discovery requests are deemed waived (or at the very least find that Defendants' general and boilerplate objections are waived). Plaintiff also asks this Court to grant it any additional and further relief to which the Court determines Plaintiff is entitled under applicable authority.

Respectfully submitted,

Dated: May 19, 2021

By: /s/ Cheryl G. Rice

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